

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**OCLC, Inc.**

**Plaintiff,**

**v.**

**ANNA’S ARCHIVE, f/k/a PIRATE  
LIBRARY MIRROR, et al.,**

**Defendants.**

**Case No. 2:24-cv-00144-MHW-EDP**

**Judge Michael H. Watson**

**Magistrate Judge Elizabeth A.  
Preston Deavers**

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**JOINT MOTION TO STAY DISCOVERY PENDING RESOLUTION OF  
DEFENDANT MARIA MATEINZO’S MOTION TO DISMISS**

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The Plaintiff OCLC, Inc. and Defendant Maria Matienzo (the “Moving Parties”) jointly and respectfully move this Court for a stay of discovery pending a ruling on Defendant Matienzo’s pending Motion to Dismiss. On April 15, 2024, Defendant Matienzo filed a motion to dismiss, raising personal jurisdiction and sufficiency grounds. (Dkt. 21.) Plaintiff OCLC opposes this motion on both grounds and requested jurisdictional discovery in the alternative. (Dkt. 30.) The motion is ripe for disposition. (*See* Dkts. 21, 30, 34.) On September 18, 2024, the parties conferred and agreed to this Joint Motion, as required by Local Rule 7.3(b).

The Moving Parties respectfully request that the Court exercise its discretion to stay discovery. *See Chrysler Corp. v. Fedders Corp.*, 643 F.2d 1229, 1240 (6th Cir. 1981); *Libertarian Party of Ohio v. Wilhelm*, No. 2:19-cv-2501, 2019 WL 4885876, at \*1 (S.D. Ohio, Oct. 3, 2019); *Ohio Bell Tel. Co., Inc. v. Global NAPs Ohio, Inc.*, No. 2:06-CV-0549, 2008 WL 641252, \*2 (S.D. Ohio Mar. 4, 2008). Ms. Matienzo’s motion addresses personal jurisdiction, which is a dispositive issue. (Dkt. 21.) In light of the nature of this motion, the Moving Parties have not yet engaged in discovery to conserve judicial and client resources until the motion is adjudicated. Accordingly,

the Moving Parties request a stay of discovery pending the Court's ruling on Defendant Matienzo's Motion to Dismiss. A proposed order is attached herein.

Date: September 19, 2024

Respectfully submitted,

/s/ Jeffrey M. Walker

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**CERTIFICATE OF SERVICE**

On September 19, 2024, this document and the accompanying attachment was filed electronically with the Clerk of the United States District Court for the Southern District of Ohio, Eastern Division, which will electronically serve a copy of the foregoing on all counsel of record for all parties, and will be served upon Anna's Archive at the following email addresses:

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/s/ Jeffrey M. Walker  
Jeffrey M. Walker

*An Attorney for Plaintiff OCLC, Inc.*